



**STATEMENT OF BASIS**  
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 BAQ Engineering Services Division

<b>Company Name:</b>	Stingray Boat Company	<b>Permit Writer:</b>	Urva Patel / James Myers
<b>Permit Number:</b>	TV-0820-0040	<b>Date:</b>	DRAFT

**DATE APPLICATION RECEIVED:** October 08, 2014

**DATE OF LAST INSPECTION:** August 19, 2013; No Violations of permit requirements or applicable regulations were observed during the course of this inspection.

**FACILITY DESCRIPTION:**

Boat Manufacturer. Manufacturing operations include mold production, mold maintenance, lamination, trimming, and assembly.

Stingray builds the molds used to manufacture the Stingray fiberglass boats that are the final product of operations. Mold building uses tooling resins, tooling gel coats, and fiberglass reinforcements. The tooling resin, mixed with chopped fiberglass and catalyst (methylethylketone peroxide, MEKP, in solvent) is applied using a non-atomized application technique. Mold produced are able to produce many parts each, such as hulls and decks. As molds are repeatedly used they require repair to insure that they retain a smooth and accurate molding surface. Stingray produces and repairs the molds used to manufacture Stingray fiberglass products.

**PROJECT DESCRIPTION:**

This is the facility's Title V Renewal.

**CHANGES SINCE LAST OP ISSUANCE:**

There have not been any construction permits or exemptions issued to this facility since the issue of the previous Title V permit on December 22, 2009.

**EMISSIONS:**

<b>FACILITY WIDE EMISSIONS*</b>		
<b>Pollutant</b>	<b>Uncontrolled Emissions</b>	<b>Controlled/Limited Emissions</b>
	<b>TPY</b>	<b>TPY</b>
PM	7.50	0.99
PM <sub>10</sub>	7.50	0.99
PM <sub>2.5</sub>	0.014	0.014
SO <sub>2</sub>	-	No Control
NO <sub>x</sub>	-	No Control
CO	-	No Control
VOC	91.8	<250
Lead	0	No Control
*Greenhouse Gases (Mass Basis)	0	No Control
*Greenhouse Gases (CO <sub>2</sub> e Basis)	0	No Control
Highest HAP Styrene, CAS# 100-42-5	69.13	No Control
Methylene Chloride CAS# 75-09-2	5.08	No Control
Methyl Methacrylate CAS# 80-62-6	4.39	No Control
Toluene CAS# 108-88-3	2.01	No Control
Xylene CAS# 1330-20-7	0.54	No Control
Cumene CAS# 98-82-8	0.036	No Control
Dibutyl Phthalate CAS# 84-74-2	0.005	No Control
n-Hexane CAS# 100-54-3	0.001	No Control
Dimethyl Phthalate CAS# 131-11-3	0.0001	No Control



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<b>FACILITY WIDE EMISSIONS*</b>		
<b>Pollutant</b>	<b>Uncontrolled Emissions</b>	<b>Controlled/Limited Emissions</b>
	<b>TPY</b>	<b>TPY</b>
Total HAPs	81.18	No Control

\* These do not include insignificant activities. The 2009 renewal statement of basis listed the uncontrolled potential VOC emissions as 313 tpy and the controlled potential emissions as 87.5 tpy. The 313 tpy uncontrolled emissions were based on the actual emissions using a multiplier of 8760 hours/actual hours. In 2009, the facility was making 3400 boats/year which is there maximum. The discrepancy between the 8760 hours and the actuals hours is due to the time it takes for the boats to dry. The facility would have to construct additional enclosed heat space for wet curing to exceed the 3400 boats. This application uses the 2013 actual emissions and a multiplier of 3400 boats per year / actual boats produced. This approach is a little more conservative but comparable to the previous method (91.8 tons vs. 87.5 tons). The <250 tpy PSD avoidance limit will remain since it was requested by the facility. The 313 tpy uncontrolled VOC emission rate does not appear to be physically possible without a change in operation that would require a construction permit.

#### OPERATING PERMIT STATUS

The facility is currently operating under a Title V permit.

#### REGULATORY APPLICABILITY REVIEW

Regulation	Comments/Periodic Monitoring Requirements					
Section II.E Synthetic Minor	This facility was issued synthetic minor construction permit 0820-0040-CA on June 20, 2000 limiting facility-wide VOC emissions to less than 249 tpy. To be consistent with the regulations this limit was changed to less than 250 tpy for the permit renewal.					
Standard No. 1	Not applicable as this facility does not have any fuel burning operations. The heaters are exempt.					
Standard No. 3 (state only)	Not applicable as this facility does not contain waste combustion or reduction sources.					
Standard No. 4	Visible emissions will be 40% for equipment installed on or before to December 31, 1985 and 20% for equipment installed after December 31, 1985.					
	Equipment IDs	PM Allowable @ Max (lb/hr)	Max Process Weight Rate (tons/hr)	Uncontrolled PM (lb/hr)	Controlled PM (lb/hr)	Monitoring
	RFC and MT	3.25	0.707	7.50	0.99	Weekly filter inspection
	The Owner/Operator shall perform a visual inspection on a semiannual basis during source operation. The owner/operator shall submit semiannual reports. If a source did not operate during the required visual inspection time frame, the log shall indicate such.					
Standard No. 5	Not applicable as this facility does not have any of the listed sources and this facility was not in existence in 1979 or 1980.					
Standard No. 5.2	Not applicable as the facility's Heaters and Comfort Heaters were constructed before June 25, 2004. And all Heaters and Comfort Heaters combust fuel but each of their capacities is less than 10E+06 Btu/hr and so each is exempt as specified by Section I(b)(1).					
Standard No. 7	<p>This regulation defines two(2) categories of major stationary sources for PSD applicability. These categories are potential emissions of 100 tpy of PSD pollutants for 28 specific industry types and potential emissions of 250 tpy of PSD pollutants for all other industry types. This facility is not specified as one of the 28 specific industry types and is in the other industry type category. PSD applicability is pollutant specific and is based on the potential to emit considering federally enforceable air pollution controls and/or federally enforceable operating conditions (i.e. emission limits, production limits etc.) This facility emits PM, PM<sub>10</sub>, PM<sub>2.5</sub>, and VOC which are PSD pollutants.</p> <p>From the statement of basis for synthetic minor construction permit 0820-0040-CA, this facility determined that its uncontrolled VOC emissions would be greater than 250 tpy. This facility does not have any VOC control</p>					



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Regulation	Comments/Periodic Monitoring Requirements
	<p>devices. In order to remove itself from PSD applicability, it originally accepted a federally enforceable VOC limit of less than or equal to 249 tpy to remove PSD applicability. For the Title V renewal, this facility recalculated that its uncontrolled VOC emissions would still be greater than 250 tpy and so the limit still applies. This limit was changed for the permit renewal to 250 tpy to be consistent with the regulations. Compliance is demonstrated by recordkeeping and calculating VOC emissions.</p> <p>Emissions of all other PSD pollutants are less than 250 tpy.</p>
61-62.6	The fugitive PM emissions are controlled in such a manner as to minimize fugitive emissions.
40 CFR 60 and 61-62.60	This facility does not have sources that meet the applicability requirements of any of the subparts contained in this standard.
40 CFR 61 and 61-62.61	This facility does not have sources that meet the applicability requirements of any of the subparts contained in this standard.
40 CFR 63 and 61-62.63	<p>This regulation incorporates the federally promulgated major source and area source standards from 40CFR Part 63, 112(g) and 112(j) into the state regulations.</p> <p><u>Subpart VVVV:</u>          This facility is classified as a major source for HAP and is subject to 40 CFR 63, Subpart VVVV (National Emission Standards For Hazardous Air Pollutants For Boat Manufacturing).          According to 40 CFR 63.5683 (a)(1) and (2), this facility builds fiberglass boats and it is a major source of HAP.</p> <p><u>Subpart JJ:</u>          40CFR63 Subpart JJ (National Emission Standards for Wood Furniture Manufacturing Operations) was reviewed for applicability since this facility could use some wood for trim in the manufacture of its boats.</p> <p>63.800 (Applicability) states that the owner or operator of a source that meets the definition for an incidental wood furniture manufacturer shall maintain purchase or usage records demonstrating that the source meets the definition in 63.801, but the source shall not be subject to any other provisions of Subpart JJ.</p> <p>From 63.801, incidental wood furniture manufacturer means a major source that is primarily engaged in the manufacture of products other than wood furniture or wood furniture components and that uses no more than 100 gallons per month of finishing material or adhesives in the manufacture of wood furniture or wood furniture components. This facility meets this definition and must comply with 63.800.</p> <p><u>Subpart WWW:</u>          It is not applicable as the processes which are employed by both “Boat Manufacturing” and “Reinforced Plastic Composites Production” are covered by the “Boat Manufacturing” NESHAPs for Stingray Boats, rather than the “Reinforced Plastic Composites Production”.</p> <p><u>Subpart PPPP:</u>          It is not applicable as per 40 CFR §63.4481(c)(15).</p>
61-62.68	This facility does not store or use chemicals subject to this regulation above the threshold quantities required to trigger applicability.
40 CFR 64	This regulation applies to sources required to have a Title V operating permit and this facility is required to have a Title V permit. CAM applies to PSEU’s that are located at a major source, subject to an emission limitation from a non-exempt regulation and uses a control device to meet the limitation and has pre-controlled emissions greater than the major source threshold. This facility will not have any PSEU’s that meet these requirements.

**MODELING REVIEW**



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Regulation	Comments/Periodic Monitoring Requirements
Standard No. 2	The air dispersion modeling section exempted this facility from having to demonstrate compliance with this standard by using air dispersion modeling. The modeling summary states that total facility-wide emission for each NAAQS pollutant is less than 1.0 lb/hr and thus is exempt from modeling for this standard. See modeling summary dated April 17, 2015.
Standard No. 7.c	This facility is located in Darlington County which had PSD minor source baselines established for SO <sub>2</sub> , NO <sub>x</sub> and PM <sub>10</sub> in 1988 and 1993. The air dispersion modeling section exempted this facility from having to demonstrate compliance with this standard by using air dispersion modeling. The previous heaters at the facility have been placed under the insignificant sources and no modeling is required for standards Nos. 2 & 7. See modeling summary dated April 17, 2015.
Standard No. 8 (state only)	The facility is subject to the 40 CFR 63, Subpart VVVV (MACT) and is exempt from standard No. 8 modeling requirements. See modeling summary dated April 17, 2015.

## PUBLIC NOTICE

This renewal of Title V Permit will undergo a 30-day public notice period and a 45-day EPA comment period in accordance with SC Regulation 61-62.1, Section II(N). This permit was placed in the The Hartsville Messenger on June 10, 2016. The comment period was open from June 10, 2016 to July 9, 2016 and was placed on the BAQ website during that time period.

## SUMMARY AND CONCLUSIONS

It has been determined that this source, if operated in accordance with the submitted application, will meet all applicable requirements and emission standards.